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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN  
RIGHTS, an unincorporated  
association, JOSEPH BURK,  
HARRY TASHDJIAN, KARYN  
PINSKY, CHARLES MALOW,  
CHARLES VAN SCOVY, GEORGE  
FREM, GARY WHITTER, and  
LEANDRO SUAREZ, individuals,

Plaintiffs,

v.

CITY OF LOS ANGELES, a  
municipal entity; COUNTY OF LOS  
ANGELES, a municipal entity; and  
DOES 1 through 10 inclusive,

Defendants.

Case No. 2:20-cv-02291

(to be related to *Orange County  
Catholic Worker et al v. County of  
Orange, et al*,  
Case No. 18-CV-00155-DOC-JDE)

**NOTICE OF RELATED CASE**  
**[C.D. Cal. L.R. 83-1.3]**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:**

In accordance with Local Rule 83-1.3, Plaintiffs LA Alliance for Human Rights, an unincorporated association, Joseph Burk, Harry Tashdjian, Karyn Pinsky, Charles Malow, Charles Van Scovy, George Frem, Gary Whitter, and Leandro Suarez (“Plaintiffs”) file the instant Notice of Related Case. This case calls for a determination of the same or substantially identical questions of law

1 and fact and is likely to entail substantial duplication of labor for the judges  
 2 assigned to each respective case.

3 **I. These Cases Should Be Related Because They Call for a  
 4 Determination of the Same or Substantially Identical Questions of Law**

5 In *Orange County Catholic Worker et al v. County of Orange, et al*, Case  
 6 No. 18-CV-00155-DOC-JDE, Judge Carter has made specific determinations of  
 7 law surrounding the issue of sufficiency of shelter needed for those experiencing  
 8 homelessness, including as required under the Ninth Circuit opinion issued in  
 9 *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019), *cert. denied*, 140 S. Ct. 674  
 10 (2019). This case involves substantially the same issue, and plaintiffs anticipate  
 11 similar or identical legal issues will be submitted to the Court for determination.

12 Additionally, the County of Los Angeles is a defendant in this case, and  
 13 any legal issues decided herein, or any agreement entered into, would necessarily  
 14 affect all 88 cities within Los Angeles County because i) the County has a  
 15 continuing obligation to provide support services to indigent persons including  
 16 and in particular those experiencing homelessness, and ii) plaintiffs argue for the  
 17 County's obligation to provide shelter beds in a more comprehensive manner  
 18 affecting all 88 cities within its jurisdiction. On September 23, 2019, plaintiffs in  
 19 *Orange County Catholic Worker* filed a motion to file a supplemental complaint  
 20 against the city of Bellflower [Docket No. 339]; that same day, plaintiffs filed a  
 21 notice of settlement and settlement agreement with the City of Bellflower  
 22 [Docket No. 341]. On October 7, 2019 the Court granted plaintiffs' motion to file  
 23 the supplemental complaint [Docket No. 351] and signed the settlement order  
 24 [Docket No. 355]. The city of Bellflower is within the County of Los Angeles;  
 25 therefore, any substantive order or agreement occurring in this case would  
 26 necessarily affect the city of Bellflower and potentially the settlement reached in  
 27 the *Orange County Catholic Worker* case. Moreover, upon information and  
 28 belief, several other cities with the County of Los Angeles are considering a

1 similar path as Bellflower and voluntarily entering into a pre-filing or concurrent-  
2 filing settlement with plaintiffs in *Orange County Catholic Worker*, and this case  
3 would affect those cities and settlements similarly. Finally, the parties in this  
4 case anticipate a potential amended complaint or crossclaim against other cities  
5 within Los Angeles County which could include Bellflower and other cities in  
6 current negotiations.

7 **II. In the Interests of Judicial Economy and Consistency, the Cases  
8 Should be Related.**

9 In light of the substantially similar legal issues presented in these cases,  
10 litigating these cases separately would create a substantial duplication of labor if  
11 heard by different judges. Judge Carter, having presided over *Orange County*  
12 *Catholic Worker* and related cases, is already familiar with the law surrounding  
13 these issues. Moreover, having separate judges within the same district deciding  
14 the same issue may result in inconsistent rulings on crucial issues, such as the  
15 sufficiency of number of beds needed to resume enforcement of certain quality of  
16 life laws under *Martin v. City of Boise*, as well as the intricacies involved in  
17 siting constitutionally appropriate shelters for those experiencing homelessness.  
18 Accordingly, relating these two cases is appropriate under Local Rule 83-1.3.1.

19  
20 Dated: March 11, 2020

/s/ Elizabeth A. Mitchell  
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